

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>ANTHONY DeFRANCO,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Civil Action No. 04-230-ERIE</b>
<b>V.</b>	)	
	)	<b>Judge Maurice B. Cohill, Jr.</b>
<b>SUPERINTENDENT WILLIAM WOLF;</b>	)	<b>Mag. Judge Susan P. Baxter</b>
<b>STEVE REILLY; DENESE BRUNNER;</b>	)	
<b>MANAGER ROD SHOWERS; CASE</b>	)	
<b>MANAGER JUDY JACKSON;</b>	)	
<b>DR. JOHN DOE; JANE DOE;</b>	)	
<b>JEFFREY BEARD; ASSIST. SUPER.</b>	)	
<b>WILLIAM BARR; MARILYN</b>	)	
<b>BROOKS,</b>	)	
<b>Defendants.</b>	)	

**MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S THIRD SET  
OF INTERROGATORIES DIRECTED DEFENDANT JACKSON**

AND NOW, come the defendants, by their attorneys, Thomas W. Corbett, Jr., Attorney General, Mary Lynch Friedline, Senior Deputy Attorney General, and Susan J. Forney, Chief Deputy Attorney General, Chief Litigation Section, and in support of their Motion for Extension of Time to Respond to Plaintiff's Third Set of Interrogatories Directed to Defendant Jackson, state the following::

1. Plaintiff has directed a Third Set of Interrogatories to Defendant Jackson, a counselor at Albion. The Interrogatories were received in this office on July 28, 2006 and thus, responses would be due August 27, 2006.

2. Defendant Jackson is currently on medical leave and is not expected to return to work for approximately one month. Accordingly, defendant Jackson requests an additional thirty (30) days in which to submit her Answers to Plaintiff's Third Set of Interrogatories.

3. Defendant submits that this extension will not prejudice plaintiff in any way at this stage of the case, particularly given the number of interrogatories already submitted to and answered by Albion personnel, including Jackson.

WHEREFORE, it is respectfully requested that the deadline for Defendant Jackson's Answers to Plaintiff's Third Set of Interrogatories be extended an additional month, until September 26, 2006.

Respectfully submitted:

Thomas W. Corbett, Jr.  
Attorney General

By: /s/ Mary Lynch Friedline  
MARY LYNCH FRIEDLINE  
Senior Deputy Attorney General  
Attorney I.D. No. 47046  
Susan J. Forney  
Chief Deputy Attorney General  
Litigation Section

Office of Attorney General  
6th Fl., Manor Complex  
564 Forbes Avenue  
Pittsburgh, PA 15219  
Date: August 23, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2006, I electronically filed the foregoing *Motion for Extension of Time to Respond to Third Set of Interrogatories to Jackson* with the Clerk of Court using the CM/ECF system. This document will be mailed via U.S. mail to the following non CM/ECF participants:

Anthony DeFranco, CZ-3518  
SCI-Albion  
10745 Route 18  
Albion, PA 16475-0001

By: /s/ Mary Lynch Friedline  
MARY LYNCH FRIEDLINE  
Senior Deputy Attorney General

Office of Attorney General  
564 Forbes Avenue  
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